

*IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
NORTHERN DIVISION AT KNOXVILLE*

IN RE:

**GREGORY WADE TAYLOR  
ERLINDA J. TAYLOR**

Case No. **3:16-bk-30939-SHB**  
Chapter 7

Debtors.

**TRUSTEE'S APPLICATION TO EMPLOY COUNSEL**

**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

Pursuant to E. D. Tenn. LBR 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of the court at Howard H. Baker, Jr. U.S. Courthouse, 800 Market Street, Suite 330, Knoxville, TN 37902, an objection within 21 days from the date this paper was filed and serve a copy on the movants' attorney, Ryan E. Jarrard, Esquire, Quist, Fitzpatrick & Jarrard, PLLC, 2121 First Tennessee Plaza, Knoxville, TN 37929-9711, or [rej@qcflaw.com](mailto:rej@qcflaw.com). If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

Comes Michael H. Fitzpatrick, Trustee, pursuant to 11 U.S.C. §327(a), Fed. R. Bankr. P. 2014 and E.D. Tenn. LBR 9013-1(h)(1)(xiv), and moves the Court for authority to employ counsel as follows:

1. The Debtor filed a voluntary Chapter 7 on March 24, 2016. Michael Fitzpatrick was appointed as Chapter 7 trustee, and continues to serve in that capacity.
2. The Trustee wishes to employ an attorney to represent the estate with respect to selling jointly owned real property of the estate, and to assist with all other needs of the estate.
3. The Trustee seeks authorization to employ Ryan E. Jarrard and the firm of Quist, Fitzpatrick & Jarrard, PLLC. The attorneys do not hold any interest adverse to the estate and are disinterested persons within the meaning of 11 U.S.C. §101(14).
4. The Trustee proposes to employ said attorneys at an hourly rate, as part of counsel's affidavit, attached hereto and incorporated herein by reference, and such expenses as may be allowed by the Court in accordance with the standard promulgated by the U.S. Trustee's Office,

with the total amount of the compensation and expenses to be fixed and determined by the Court upon proper application at the conclusion of the attorneys' services.

5. The Trustee is entitled to employ an attorney, with Court approval, pursuant to 11 U.S.C. §327(a).

6. There is no application for a post-petition retainer. There are no actual or potential conflicts of interest. There are no other facts which would preclude retention of counsel.

**WHEREFORE**, the undersigned prays that he be authorized to employ the aforesaid attorney under the terms and conditions set forth, *nunc pro tunc* to the date this application is filed.

Respectfully submitted,

/s/ Michael H. Fitzpatrick

Michael H. Fitzpatrick, Trustee

BPR No. 006033

**Quist, Fitzpatrick & Jarrard, PLLC**

2121 First Tennessee Plaza

800 South Gay Street

Knoxville, TN 37929-9711

(865) 524-1873 ext. 222

MHF@QCFLaw.com

/s/ Ryan E. Jarrard

Ryan E. Jarrard, Esq.

BPR No. 024525

Attorney for Michael H. Fitzpatrick, Trustee

**Quist, Fitzpatrick & Jarrard, PLLC**

2121 First Tennessee Plaza

800 South Gay Street

Knoxville, TN 37929-9711

(865) 524-1873 ext. 232

REJ@QCFLaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Trustee's Application to Employ Counsel, Affidavit of Professional Person and proposed Order have been served upon the indicated parties by placing a copy thereof in the U.S. Mail, first class postage prepaid, via email or ECF this July 1, 2016:

Office of the U.S. Trustee  
VIA ECF

Richard M. Mayer  
John P. Newton  
VIA ECF

All Parties in Interest on the attached list

/s/ Michael H. Fitzpatrick  
ATTORNEY

Label Matrix for local noticing  
0649-3  
Case 3:16-bk-30939-SHB  
Eastern District of Tennessee  
Knoxville  
Fri Jul 1 08:53:30 EDT 2016

Y-12 Federal Credit Union  
c/o Thomas H. Dickenson  
P.O. Box 869  
Knoxville, TN 37901-0869

AA Title Pawn  
11941 Chapman Hwy.  
Seymour, TN 37865-6237

Arrow Financial Services  
21031 Network Place  
Chicago, IL 60678-1031

Bank of America  
P.O. Box 5270  
Carol Stream, IL 60197-5270

Capital One Bank  
P.O. Box 85147  
Richmond, VA 23276-0001

Celtic Bank  
ATTN: Business Dept.  
268 State Street, #300  
Salt Lake City, UT 84111-5314

Covington Credit  
1204 E. Magnolia Avenue  
Knoxville, TN 37917-7745

(p)HSBC BANK  
ATTN BANKRUPTCY DEPARTMENT  
PO BOX 5213  
CAROL STREAM IL 60197-5213

First National Bank of Omaha  
1620 Dodge Street, Stop code 3105  
Omaha, NE 68197-0002

Aspire Visa  
P.O. Box 790317  
St. Louis, MO 63179-0317

3  
United States Bankruptcy Court  
Howard H. Baker Jr. U.S. Courthouse  
Suite 330, 800 Market Street  
Knoxville, TN 37902-2343

American Express  
P.O. Box 360001  
Fort Lauderdale, FL 33336-0001

(p)ASPIRE VISA  
P O BOX 105555  
ATLANTA GA 30348-5555

Barclays Bank Card  
P.O. Box 13337  
Philadelphia, PA 19101-3337

Capital One Bank  
P.O. Box 85184  
Richmond, VA 23285-5184

Client Services Inc.  
3451 Harry S. Truman Blvd.  
Saint Charles, MO 63301-9816

(p)DELL FINANCIAL SERVICES  
P O BOX 81577  
AUSTIN TX 78708-1577

Ditech.Com  
P.O. Box 205  
Waterloo, IA 50704-0205

Flurish Inc. dba Lendup  
237 Keamy Street, #372  
San Francisco, CA 94108

REPUBLIC FINANCE  
932 E Emory Road  
Knoxville, TN 37938-4617

1st Franklin Financial  
PO Box 4357  
Sevierville, TN 37864

American Express Capital Line  
P.O. Box 36002  
Fort Lauderdale, FL 33336-0002

Avant Inc.  
640 N Lasalle Street  
Chicago, IL 60654-3731

Barclays Bank Delaware  
125 S West Street  
Wilmington, DE 19801-5014

Carlyle Jewelers  
P.O. Box 609  
Memphis, TN 38101-0609

Countrywide Home Loans  
P.O. Box 660694  
Dallas, TX 75266-0694

Dept Of Ed/Navient  
P.O. Box 9635  
Wilkes Barre, PA 18773-9635

First National Bank Omaha  
P.O. Box 3412  
Omaha, NE 68103-0412

Ft. Sanders Sevier Medical Center  
Knoxville Business Office Services  
Bldg. B, Ste. 401  
1410 Centerpoint Blvd.  
Knoxville, TN 37932-1985

Great Plains Lending  
7490 US Highway 17  
Red Rock, OK 74651

Grisham, Knight & Hooper, et al  
P.O. Box 11583  
Chattanooga, TN 37401-2583

HC Credit  
203 E Emma Ave Ste A  
Springdale, AR 72764-4625

HSN/Comenity Capital  
995 W 122nd Avenue  
Westminster, CO 80234-3417

Havertys Credit Svs.  
P.O. Box 740506  
Atlanta, GA 30374-0506

Kabbage Inc./Celtic Bank  
925B Peachtree Street, #1688  
Atlanta, GA 30309-3918

Kenny L. Saffles, Esq.  
Howard H. Baker Jr. US Courthouse  
800 Market Street, #211  
Knoxville, TN 37902-2342

Knox Co. General Sessions Court  
Civil Division  
P.O. Box 379  
Knoxville, TN 37901-0379

Law Officer of Gerald E. Moores & Assoc.  
P.O. Box 724087  
Atlanta, GA 31139-1087

Lowes  
P.O. Box 105980, Dept. 79  
Atlanta, GA 30348-5980

Mary Anne Villareal  
2407 Trout Stream Drive  
Raleigh, NC 27604-3940

Masterpiece Pawn  
10721 Chapman Hwy.  
Seymour, TN 37865-4765

Michelle M. Taylor  
2924 Chestnut Lane, #2  
Johnson City, TN 37601-5192

MobiLoans  
P.O. Box 1409  
Marksville, LA 71351-1409

NCO Financial Systems  
P.O. Box 7590, Dept. 64  
Hampton, VA 23666-0590

National Credit Adjusters  
P.O. Box 3023  
327 W. Forth Street  
Hutchinson, KS 67504-3023

Nautilus  
HC Processing Center  
P.O. Box 829  
Springdale, AR 72765-0829

Navient Solutions, Inc. Department of Educat  
Loan Services  
P.O. Box 9635  
Wilkes-Barre, PA 18773-9635

One Main Financial  
P.O. Box 499  
Hanover, MD 21076-0499

PayPal Working Capital  
ATTN: Executive Escalation  
P.O. Box 5018  
Lutherville Timonium, MD 21094-5018

PayPal/SYNCB  
P.O. Box 965005  
Orlando, FL 32896-5005

Primary Financial Services, LLC  
3115 North 3rd Avenue, Suite 112  
Phoenix, AZ 85013-4387

Quantum3 Group LLC as agent for  
Comenity Capital Bank  
PO Box 788  
Kirkland, WA 98083-0788

Regional Finance  
1645 Downtown West Blvd., Unit 11  
Knoxville, TN 37919-5411

(p)REPUBLIC FINANCE LLC  
1140 ROMA AVE  
HAMMOND LA 70403-5464

River Hills Community Assoc.  
P.O. Box 5007  
Clover, SC 29710-5001

Rooms to Go/Household Bank  
Dept. 7680  
Carol Stream, IL 60116-7680

Sevier Anesthesia Associates  
P.O. Box 141  
Pigeon Forge, TN 37868-0141

Sevier Co. Circuit Court  
Sevier County Courthouse, Ste. 204  
P.O. Box 4426  
Sevierville, TN 37864-4426

Sevier Co. General Sessions Court  
Sevier Co. Courthouse  
125 Court Ave.  
Sevierville, TN 37862-3596

Seymour Cash Advance  
12219 Chapman Hwy.  
Seymour, TN 37865-6240

Shoppers Charge Account  
P.O. Box 215  
Memphis, TN 38101-0215

State of Tennessee  
Dept. of Financial Responsibility  
P.O. Box 945  
Nashville, TN 37202-0945

TN Dept of Finc. Respon.  
c/o Tennessee Attorney Generals Office  
Bankruptcy Division  
P.O. Box 20207  
Nashville, TN 37202-4015

TSAC  
404 James Robertson Pkwy  
1950 Parkway Towers  
Nashville, TN 37219

TSAC  
TN Attorney General's Office  
Bankruptcy Unit  
426 5th Avenue, 2nd Floor  
Nashville, TN 37243-0489

Terry Canady, Atty.  
223 Madison Street, #205  
Madison, TN 37115-3663

The Dillion Law Firm  
2775 Cruse Road, #201  
Lawrenceville, GA 30044-7141

(p)U S DEPARTMENT OF EDUCATION  
P O BOX 5609  
GREENVILLE TX 75403-5609

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

US Dept. of Education  
P.O. Box 5609  
Greenville, TX 75403-5609

United Recovery Systems LP  
PO Box 722929  
Houston, TX 77272-2929

United States Trustee  
800 Market Street, Suite 114  
Howard H. Baker Jr. U.S. Courthouse  
Knoxville, TN 37902-2303

Verizon Wireless  
P.O. Box 105378  
Atlanta, GA 30348-5378

Verizon Wireless  
P.O. Box 660108  
Dallas, TX 75266-0108

Viking Collection Service, Inc.  
PO Box 59207  
Minneapolis, MN 55459-0207

Wal Mart/SYNCB  
P.O. Box 965024  
Orlando, FL 32896-5024

Web Bank  
215 State Street, #1000  
Salt Lake City, UT 84111-2336

William McCormick  
Office of the Attorney General  
Bankruptcy Unit  
426 5th Avenue, 2nd Floor  
Nashville, TN 37243-0489

Y-12 Federal Credit Union  
501 LaFayette Drive  
P.O. Box 2512  
Oak Ridge, TN 37831-2512

Erlinda J. Taylor  
1120 S. Old Sevierville Pike  
Seymour, TN 37865-4027

Gregory Wade Taylor  
1120 S. Old Sevierville Pike  
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Suite S-570  
Knoxville, TN 37919-4046

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800 S. Gay Street  
2121 First Tennessee Plaza  
Knoxville, TN 37929-9711

Richard M. Mayer  
Law Offices of Mayer & Newton  
1111 Northshore Drive  
Suite S-570  
Knoxville, TN 37919-4046

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Aspire  
P.O. Box 23007  
Columbus, GA 31902-3007

Dell Preferred Account  
P.O. Box 6403  
Carol Stream, IL 60197-6403

Direct Merchants Bank  
P.O. Box 21550  
Tulsa, OK 74121-1550

Republic Finance LLC  
1140 Roma Ave  
Hammond, LA 70403

U S Department of Education  
50 Beale St. #8629  
San Francisco, CA 94105

US Bank  
200 Gibraltar Rd Ste 200  
Horsham, PA 19044

(d)US Bank  
P.O. Box 5227  
Cincinnati, OH 45201

(d)US Bank  
P.O. Box 790408  
Saint Louis, MO 63179-0408

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Aspire Visa  
P O Box 790317  
St. Louis, MO 63179-0317

(d)Republic Finance  
992 E. Emory Road  
Knoxville, TN 37938-4617

End of Label Matrix	
Mailable recipients	84
Bypassed recipients	2
Total	86